

EXHIBIT J

From: Cassandra.Baloga@lw.com <Cassandra.Baloga@lw.com>
Sent: Friday, June 3, 2022 2:02 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; truitt.a@wssllp.com
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; Rory.Miller@lockelord.com; SKYRYSEMOOG.LWTEAM@lw.com; Rena Andoh <RAndoh@sheppardmullin.com>; green.a@wssllp.com
Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Kazim,

As a follow up to our correspondence below, Skyryse still intends to supplement Interrogatory Nos. 2-10 and RFA Nos. 1-3, as needed, but we are still investigating and need more time to supplement these discovery responses, so do not expect to serve a supplement this week.

Best,

Cassandra Marie Baloga
Pronouns: she/her/hers

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Thursday, May 26, 2022 3:09 PM
To: Baloga, Cassandra (NY) <Cassandra.Baloga@lw.com>; truitt.a@wssllp.com
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; Rory.Miller@lockelord.com; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>; Rena Andoh <RAndoh@sheppardmullin.com>; green.a@wssllp.com
Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Counsel:

We are again disappointed with Skyryse's improper delay and refusal to meet its own commitments in providing supplemental responses. The timeline of events regarding Skyryse's written discovery responses is as follows:

- April 13 – Skyryse serves its written discovery responses (RFPs, RFAs, and Interrogatories).
- April 19 – Moog serves a meet and confer letter addressing all of Skyryse's discovery responses.
- April 25 – Skyryse pushes off a meet and confer session scheduled that same day in light of its "disclosures"
- April 25 and 26 – Skyryse makes disclosures to Moog and the Court regarding its possession of a "concerning" volume of Moog non-public information, an "alarming series of deletions" by Skyryse employees, and placing 15 Skyryse employees on administrative leave. During the April 26 Conference, Skyryse's counsel also state unequivocally that its discovery responses would need to be "corrected" and/or "amended." (See ECF 95).

- May 4 – Skyrise serves a letter committing to supplementing its responses to Interrogatories Nos. 2-10 and RFAs Nos. 1-3.
- May 13 – the Parties meet and confer and Skyrise states it aims to provide supplemental responses to Interrogatories Nos. 2-10 and RFAs Nos. 1-3 by May 23. This is confirmed in a May 16 e-mail from Ms. Storey.
- May 25 – Skyrise states it will not be providing supplemental responses by May 26, as previously promised.

In addition to the substantial delay, Skyrise continues to use qualifiers such as “as needed” regarding the responses it intends to supplement. Based on Skyrise’s unequivocal written commitments in its May 4 letter, our understanding is that Skyrise will be supplementing its responses to Interrogatories Nos. 2-10 and RFAs Nos. 1-3. If that is not correct, please let us know immediately. Certainly, Skyrise knows right now which discovery responses it will supplement.

In light of Skyrise’s written commitment below to serve supplemental responses next week, we will defer our filing of a motion to compel until after we receive the responses. However, any further delay is not acceptable.

Further, Skyrise has not gotten back to us on our May 23 letter summarizing our May 20 meet and confer regarding Skyrise’s responses and positions with respect to Moog RFPs Nos. 1-11. Please respond in writing this week. We need to know Skyrise’s positions on each outstanding discovery request to understand whether we are at an impasse so we can address any impasse promptly. We reserve all rights.

Thank you,
Kazim

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From: Cassandra.Baloga@lw.com <Cassandra.Baloga@lw.com>
Sent: Wednesday, May 25, 2022 3:03 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; trutt.a@wssllp.com
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>;
RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; Rory.Miller@lockelord.com;
SKYRYSEMOOG.LWTEAM@lw.com; Rena Andoh <RAndoh@sheppardmullin.com>; green.a@wssllp.com
Subject: RE: Moog/Skyrise - Proposed Expedited Discovery Schedule

Kazim,

As a follow up to our correspondence below, Skyrise is still committed to supplementing Interrogatory Nos. 2-10 and RFA Nos. 1-3 as needed, in view of Skyrise’s ongoing investigation. As we previously stated, we have been working on supplementing certain responses with the goal of having them to you by May 26. Given the nature and scope of the investigation, Skyrise will need more time. We are continuing to work diligently on these responses and anticipate getting them to you as early as possible next week.

Best,

Cassandra Marie Baloga

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From: Storey, Kelley (DC) <Kelley.Storey@lw.com>

Sent: Monday, May 16, 2022 4:41 PM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; Alexander Truitt <truitt.a@wssllp.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>;

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Rena Andoh <RAndoh@sheppardmullin.com>; Anthony Green <green.a@wssllp.com>

Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Kazim,

Thank you for sending this summary. A few notes from us:

Skyryse's Supplemental Discovery Responses:

Without committing to the manner of supplementation, Skyryse is aiming to supplement Interrogatories Nos. 2-10 and RFAs Nos. 1-3 if and as needed by May 26th. We do not see it necessary to schedule a meet and confer before then but will be open to doing so if a need arises.

Skyryse's RFP Responses:

As discussed, Skyryse plans to produce documents consistent with its obligations in discovery and under applicable orders issued by the Court. To the extent the topic of "supplemental productions" came up in our call, this is what we were referring to, not any specific RFPs.

Segregated Files Sent to iDS:

As discussed, Skyryse aims to let you know today the status of our review of the over 11,500 segregated files sent to iDS, but we may need more time.

Thank you for meeting with us and we will be in touch later this week.

Kelley Storey

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Friday, May 13, 2022 2:55 PM
To: Alexander Truitt <truitt.a@wssllp.com>; Storey, Kelley (DC) <Kelley.Storey@lw.com>
Cc: Lumish, Douglas (Bay Area) <Doug.Lumish@lw.com>; Gross, Gabriel (Bay Area) <Gabe.Gross@lw.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; Subjeck, Melissa N. <MSubjeck@hodgsonruss.com>; Rory.Miller@lockelord.com; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>; Rena Andoh <RAndoh@sheppardmullin.com>; Anthony Green <green.a@wssllp.com>
Subject: RE: Moog/Skyryse - Proposed Expedited Discovery Schedule

Counsel—

Thank you for meeting and conferring on various issues. Below is a summary of what was discussed, next steps, and related deadlines.

Moog's Proposed Revised Case Schedule:

Counsel for all defendants are in agreement with the proposed PI hearing date. Counsel for the Individual Defendants will get back to us in writing by today or early next week regarding the other discovery-related deadlines. Counsel for Skyryse will get back to us by Tuesday regarding the discovery-related deadlines.

Skyryse's Supplemental Discovery Responses:

In a May 4 letter, Skyryse committed to supplementing its responses to Interrogatories Nos. 2-10 and RFAs Nos. 1-3. Skyryse believes that supplementation by May 26 is attainable, but it cannot commit today regarding the manner of such supplementation. We expect to receive supplemental responses by May 26. Given that there may be additional issues after receiving the responses, we propose scheduling a further meet and confer on May 31 so that we can crystallize all outstanding issues before Moog's proposed June 2 deadline to submit discovery disputes to the Court. If we determine there are no further issues after receiving the supplemental responses on May 26, then we can cancel the meet and confer. Please let us know your availability on May 31.

Skyryse's RFP Responses:

Skyryse will let us know in writing its positions on each of RFPs Nos. 1-11 by Wednesday.

Skyryse also indicated it was working on "supplemental productions" to be made on May 26, but cannot state what documents will be produced. To be clear, Skyryse has not produced any documents in response to Moog's RFPs, so our understanding is that "supplemental productions" refers to additional documents produced in response to the Stipulated March 11 Order. Please clarify which RFPs the "supplemental productions" pertain to, if any, in Skyryse's written explanation to be provided by Wednesday.

10 Moog Source Code Files:

Skyryse will let us know by Tuesday its position as to whether we can show these documents to our clients and that they will be deemed to have been designated by Moog as AEO-Source Code.

Segregated Files Sent to iDS:

Skyryse will let us know by Monday the status of its review of the over 11,500 segregated files sent to iDS.

Skyryse's Trade Secret Identification Objection:

We discussed our respective positions on this issue. In Skyryse's written response regarding the RFPs to be provided by Wednesday, please clarify for which of Moog's RFPs (if any) Skyryse intends to rely on this objection to not produce responsive documents.

Thank you and have a nice weekend.

Best,
Kazim

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